## UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

CURITIES AND EXCHANGE COMMISSION,

Plaintiff, : 19-cv-9439 (PKC)

- against - : ECF Case

TELEGRAM GROUP INC., and TON ISSUER INC.,

:

Defendants,

:

## **NOTICE OF MOTION**

PLEASE TAKE NOTICE that Plaintiff Securities and Exchange Commission (the "SEC"), upon (1) the accompanying memorandum of law and (2) the declaration of Kevin P. McGrath, dated October 23, 2019, and the exhibits thereto, will move this Court, before the Honorable P. Kevin Castel, at the United States Courthouse, Courtroom 11D, 500 Pearl Street, New York, New York 10007, at such time as the Court may designate, for an order permitting the SEC to file under seal, and in redacted form on ECF, certain documents submitted in support of the SEC's Emergency Application for an Order to Show Cause, Temporary Restraining Order and Order Granting Expedited Discovery and Other Relief dated October 11, 2019, as specified in the memorandum of law accompanying the instant Notice of Motion.

Dated: New York, New York October 23, 2019

/s/ Kevin McGrath

Kevin McGrath
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